

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Civil Action No. 4:20-cv-00957-SDJ

**DECLARATION OF ROBERT J. MCCALLUM IN SUPPORT OF  
GOOGLE’S MOTIONS FOR SUMMARY JUDGMENT**

I, Robert J. McCallum, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am Of Counsel to the law firm Freshfields US LLP, which represents Defendant Google LLC (“Google”) in the above-captioned case.

2. I am an attorney admitted to practice in the State of New York and in the United States District Courts for the Southern District of New York and the Eastern District of New York. I have been admitted to appear pro hac vice in the above-captioned case.

3. I respectfully submit this Declaration in support of Google’s Motions for Summary Judgment, dated November 18, 2024.

4. Attached to this declaration as **Exhibit 1** is a true and correct copy of excerpts of the expert report of Jeffrey S. Andrien on behalf of Plaintiffs in this case, dated June 7, 2024.

5. Attached to this declaration as **Exhibit 2** is a true and correct copy of excerpts of the expert report of John Chandler on behalf of Plaintiffs in this case, dated June 7, 2024.

6. Attached to this declaration as **Exhibit 3** is a true and correct copy of excerpts from the expert report of Joshua Gans on behalf of Plaintiffs in this case, dated June 7, 2024.

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7. Attached to this declaration as **Exhibit 4** is a true and correct copy of excerpts of the expert report of Jacob Hochstetler on behalf of Plaintiffs in this case, dated June 7, 2024.

8. Attached to this declaration as **Exhibit 5** is a true and correct copy of excerpts of the expert report of Parag Pathak on behalf of Plaintiffs in this case, dated June 7, 2024.

9. Attached to this declaration as **Exhibit 6** is a true and correct copy of excerpts of the expert report of Matthew Weinberg on behalf of Plaintiffs in this case, dated June 7, 2024.

10. Attached to this declaration as **Exhibit 7** is a true and correct copy of excerpts of the expert report of Michael R. Baye on behalf of Defendant in this case, dated August 6, 2024.

11. Attached to this declaration as **Exhibit 8** is a true and correct copy of excerpts of the expert report of Paul R. Milgrom on behalf of Defendant in this case, dated July 30, 2024.

12. Attached to this declaration as **Exhibit 9** is a true and correct copy of excerpts of the expert report of Steven N. Wiggins on behalf of Defendant in this case, dated July 30, 2024.

13. Attached to this declaration as **Exhibit 10** is a true and correct copy of excerpts of the expert rebuttal report of Jeffrey S. Andrien on behalf of Plaintiffs in this case, dated September 9, 2024.

14. Attached to this declaration as **Exhibit 11** is a true and correct copy of excerpts of the expert rebuttal report of Joshua Gans on behalf of Plaintiffs in this case, dated September 9, 2024.

15. Attached to this declaration as **Exhibit 12** is a true and correct copy of excerpts of the expert rebuttal report of Matthew Weinberg on behalf of Plaintiffs in this case, dated September 9, 2024.

16. Attached to this declaration as **Exhibit 13** is a true and correct copy of excerpts from the transcript of the deposition of John Chandler, expert witness on behalf of Plaintiffs in

this case, taken pursuant to the Stipulation and Order Regarding Expert Discovery, ECF No. 184, on October 24, 2024 in this action.

17. Attached to this declaration as **Exhibit 14** is a true and correct copy of excerpts from the transcript of the deposition of David DeRamus, expert witness on behalf of Plaintiffs in this case, taken pursuant to the Stipulation and Order Regarding Expert Discovery, ECF No. 184, on October 28, 2024 in this action.

18. Attached to this declaration as **Exhibit 15** is a true and correct copy of excerpts from the transcript of the deposition of Joshua Gans, expert witness on behalf of Plaintiffs in this case, taken pursuant to to the Stipulation and Order Regarding Expert Discovery, ECF No. 184, on October 10, 2024 in this action.

19. Attached to this declaration as **Exhibit 16** is a true and correct copy of excerpts from the transcript and errata of the deposition of Jacob Hochstetler, expert witness on behalf of Plaintiffs in this case, taken pursuant to the Stipulation and Order Regarding Expert Discovery, ECF No. 184, on October 1, 2024 in this action.

20. Attached to this declaration as **Exhibit 17** is a true and correct copy of excerpts from the transcript and attorney errata of the deposition of Cynthia Rudin, expert witness on behalf of Plaintiffs in this case, taken pursuant to the Stipulation and Order Regarding Expert Discovery, ECF No. 184, on October 9, 2024 in this action.

21. Attached to this declaration as **Exhibit 18** is a true and correct copy of excerpts from the transcript of the deposition of Matthew Weinberg, expert witness on behalf of Plaintiffs in this case, taken pursuant to the Stipulation and Order Regarding Expert Discovery, ECF No. 184, on October 8, 2024 in this action.

22. Attached to this declaration as **Exhibit 19** is a true and correct copy of the Declaration of Nitish Korula in support of Google's Motion for Summary Judgment, dated November 18, 2024.

23. Attached to this declaration as **Exhibit 20** is a true and correct copy of the Declaration of Nirmal Jayaram in support of Google's Motion for Summary Judgment, dated November 18, 2024.

24. Attached to this declaration as **Exhibit 21** is a true and correct copy of the Declaration of [REDACTED] in support of Google's Motion for Summary Judgment, dated November 18, 2024.

25. Attached to this declaration as **Exhibit 22** is a true and correct copy of the Declaration of [REDACTED] dated June 28, 2024, produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-C-000073682 to GOOG-AT-MDL-C-000073692.

26. Attached to this declaration as **Exhibit 23** is a true and correct copy of the Declaration of [REDACTED] dated July 11, 2024, produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-C-000076497 to GOOG-AT-MDL-C-000076501.

27. Attached to this declaration as **Exhibit 24** is a true and correct copy of the Declaration of Nirmal Jayaram dated August 5, 2023, produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-008842383 to GOOG-AT-MDL-008842392.

28. Attached to this declaration as **Exhibit 25** is a true and correct copy of excerpts of Google's First Amended Responses and Objections to Plaintiffs' Third Set of Interrogatories, dated May 1, 2024.

29. Attached to this declaration as **Exhibit 26** is a true and correct copy of excerpts from a presentation titled “Display Ads Finance,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-001950473 to GOOG-AT-MDL-001 950510.

30. Attached to this declaration as **Exhibit 27** is a true and correct copy of excerpts from a presentation titled “Active Line Item (ALI) Limit exceptions,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-004345238 to GOOG-AT-MDL-004345258.

31. Attached to this declaration as **Exhibit 28** is a true and correct copy of a document titled “Header bidding in yield groups,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-006196134 to GOOG-AT-MDL-006196139.

32. Attached to this declaration as **Exhibit 29** is a true and correct copy of a document titled “Header bidding yield groups - Set-up guide,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-006233134 to GOOG-AT-MDL-006233136.

33. Attached to this declaration as **Exhibit 30** is a true and correct copy of a document titled “DRS and RPO interaction in Simulation,” produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-007375273.

34. Attached to this declaration as **Exhibit 31** is a true and correct copy of a document produced by Google in this matter, and bearing the Bates No. GOOG-AT-MDL-008991406.

35. Attached to this declaration as **Exhibit 32** is a true and correct copy of excerpts from a presentation titled “Learn with ASAP: Google Marketing Platform Foundations,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-009760897 to GOOG-AT-MDL-009760974.

36. Attached to this declaration as **Exhibit 33** is a true and correct copy of an excerpt from a document titled “Project Poirot,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-009835376 to GOOG-AT-MDL-009835385.

37. Attached to this declaration as **Exhibit 34** is a true and correct copy of email correspondence from [REDACTED] to [REDACTED], et al., with the subject line “Re: [Adsense-eng-wat] [Adsense-eng] Re: [Ads-engdirs] DoubleClick Ad Exchange 2.0 - Launched!,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-010836318 to GOOG-AT-MDL-010836321.

38. Attached to this declaration as **Exhibit 35** is a true and correct copy of a document titled “DRS commercialization plan - April 2016,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-016926948 to GOOG-AT-MDL-016926954.

39. Attached to this declaration as **Exhibit 36** is a true and correct copy of an Order Form titled “Google Ad Manager 360 Service,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-019743216 to GOOG-AT-MDL-019743237.

40. Attached to this declaration as **Exhibit 37** is a true and correct copy of an excerpt from a document titled “Project Bernanke (Draft as of 11/27/2013),” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-B-002088854 to GOOG-AT-MDL-B-002088860.

41. Attached to this declaration as **Exhibit 38** is a true and correct copy of excerpts from a presentation titled “The Arrival of Real-Time Bidding and What it Means for Media Buyers,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-B-003881091 to GOOG-AT-MDL-B-003881108.

42. Attached to this declaration as **Exhibit 39** is a true and correct copy of excerpts from a document titled “New doc: 2018 onwards,” produced by Google in this matter, and bearing the Bates Nos. GOOG-AT-MDL-B-004377628 to GOOG-AT-MDL-B-004377790.

43. Attached to this declaration as **Exhibit 40** is a true and correct copy of excerpts from a Google Ad Manager Help page titled “2016 releases archive,” produced by Google in this matter, and bearing Bates nos. GOOG-AT-MDL-C-000015769 to GOOG-AT-MDL-C-000015788.

44. Attached to this declaration as **Exhibit 41** is a true and correct copy of an excerpt from a document titled “ads Postmortem: DFP PSI Out of Memory when Matching Too Many Line Items,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-C-000018303 to GOOG-AT-MDL-C-000018329.

45. Attached to this declaration as **Exhibit 42** is a true and correct copy of a document titled “Ad Exchange auction model,” produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-C-000035250.

46. Attached to this declaration as **Exhibit 43** is a true and correct copy of a document titled “Ad Exchange auction model,” produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-C-000035251.

47. Attached to this declaration as **Exhibit 44** is a true and correct copy of a document titled “Ad Exchange auction model,” produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-C-000035252.

48. Attached to this declaration as **Exhibit 45** is a true and correct copy of a Google Ad Manager blog post titled “Simplifying programmatic: first price auctions for Google Ad

Manager,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-C-000072098 to GOOG-AT-MDL-C-000072100.

49. Attached to this declaration as **Exhibit 46** is a true and correct copy of a Google Ad Manager blog post titled “Smarter optimizations to support a healthier programmatic market,” produced by Google in this matter, and bearing Bates Nos. GOOG-AT-MDL-C-000086317 to GOOG-AT-MDL-C-000086320.

50. Attached to this declaration as **Exhibit 47** is a true and correct copy of excerpts from a presentation titled “Mysteries of Dynamic Allocation,” produced by Google in this matter, and bearing the Bates Nos. GOOG-DOJ-03601148 to GOOG-DOJ-03601190.

51. Attached to this declaration as **Exhibit 48** is a true and correct copy of excerpts from a presentation titled “Path to Premium: A refined strategy for a rapidly evolving industry,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-03610481 to GOOG-DOJ-03610542.

52. Attached to this declaration as **Exhibit 49** is a true and correct copy of a document titled “AdX dynamic sell-side rev share (DRS v1) - project description / mini PRD,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-03619484 to GOOG-DOJ-03619485.

53. Attached to this declaration as **Exhibit 50** is a true and correct copy of an excerpt from a document titled “Sell side BFM Deck,” produced by Google in this matter, and bearing the Bates Nos. GOOG-DOJ-03637251 to GOOG-DOJ-03637264.

54. Attached to this declaration as **Exhibit 51** is a true and correct copy of email correspondence from [REDACTED] to [REDACTED], et al., with the subject line “Re: GDN



Dynamic Revshare launched today!,” produced by Google in this matter, and bearing Bates No. GOOG-DOJ-04306227.

55. Attached to this declaration as **Exhibit 52** is a true and correct copy of email correspondence from [REDACTED] to AdX Buy-Side Global Sales, et al., with the subject line “[ANNOUNCED] Smarter optimizations for DoubleClick Ad Exchange,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-04934481 to GOOG-DOJ-04934482.

56. Attached to this declaration as **Exhibit 53** is a true and correct copy of a document titled “Dynamic Revenue Share,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-04937543 to GOOG-DOJ-04937550.

57. Attached to this declaration as **Exhibit 54** is a true and correct copy of excerpts from a presentation titled “Core Team Sellside Review,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-06134599 to GOOG-DOJ-06134656.

58. Attached to this declaration as **Exhibit 55** is a true and correct copy of excerpts from a presentation titled “Unified 1st Price Auction: Simplifying the auction on Ad Manager and Admob,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-06525908 to GOOG-DOJ-06525934.

59. Attached to this declaration as **Exhibit 56** is a true and correct copy of email correspondence from Neal Moahn to Display Eng, et al., with the subject line “Display and Video Ads: 2014 Mid-Year Check-in, Strategy Update (CONFIDENTIAL),” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-06589992 to GOOG-DOJ-06589995.

60. Attached to this declaration as **Exhibit 57** is a true and correct copy of a presentation titled “Project Bernanke: Quantitative Easing on the Ad Exchange,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-06842351 to GOOG-DOJ-06842362.

61. Attached to this declaration as **Exhibit 58** is a true and correct copy of an Order Form titled “DFP Small Business and AdX Services,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-06873988 to GOOG-DOJ-06873994.

62. Attached to this declaration as **Exhibit 59** is a true and correct copy of a document titled “Data Transfer - Breaking Joinability [REDACTED],” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-06882294 to GOOG-DOJ-06882298.

63. Attached to this declaration as **Exhibit 60** is a true and correct copy of a document titled “doubeclick for publishers comms doc,” produced by Google in this matter, and bearing the Bates Nos. GOOG-DOJ-06885161 to GOOG-DOJ-06885170.

64. Attached to this declaration as **Exhibit 61** is a true and correct copy of email correspondence on behalf of [REDACTED] to [REDACTED], et. al., with the subject line “Re: [drx-pm] LAUNCHED! Dynamic Pricing (RPO) for AdX sellers,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-07235914 to GOOG-DOJ-07235919.

65. Attached to this declaration as **Exhibit 62** is a true and correct copy of a document titled “Master Comms Doc: First Price Auction/Unified Pricing,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-07292531 to GOOG-DOJ-07292539.

66. Attached to this declaration as **Exhibit 63** is a true and correct copy of excerpts from a presentation titled “PRD/Strat review: Network health,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-07955876 to GOOG-DOJ-07955915.

67. Attached to this declaration as **Exhibit 64** is a true and correct copy of excerpts from a presentation titled “Demand Syndication aka ‘Jedi’ internally,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-09459336 to GOOG-DOJ-09459356.

68. Attached to this declaration as **Exhibit 65** is a true and correct copy of excerpts from a document titled “Limits Enforcement,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-09494195 to GOOG-DOJ-09494207.

69. Attached to this declaration as **Exhibit 66** is a true and correct copy of a document titled “[Comms Doc] - Ad Manager Unified 1st Price Auction,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-09714662 to GOOG-DOJ-09714667.

70. Attached to this declaration as **Exhibit 67** is a true and correct copy of email correspondence by [REDACTED] to [REDACTED], et al., with the subject line “Re: Just not cricket,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-09715071 to GOOG-DOJ-09715073.

71. Attached to this declaration as **Exhibit 68** is a true and correct copy of an excerpt from a document titled “[Comms Doc] - First Price Auction for Authorized Buyers / Open Bidders,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-10736364 to GOOG-DOJ-10736374.

72. Attached to this declaration as **Exhibit 69** is a true and correct copy of excerpts from a presentation titled “The Unified Auction: Google Top Partners Event,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-11697964 to GOOG-DOJ-11698043.

73. Attached to this declaration as **Exhibit 70** is a true and correct copy of excerpts from a presentation titled “DVAA Quality, Formats, O&O: Q12019 All Hands,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-11726308 to GOOG-DOJ-1 1726359.

74. Attached to this declaration as **Exhibit 71** is a true and correct copy of excerpts from a presentation titled “XFP+AdX Revenue Optimization via Cross-Priority Ranking,”

produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13197448 to GOOG-DOJ-13197514.

75. Attached to this declaration as **Exhibit 72** is a true and correct copy of excerpts from a presentation titled “AdX DRS v1 launch review,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13199952 to GOOG-DOJ-13199962.

76. Attached to this declaration as **Exhibit 73** is a true and correct copy of a document titled “AdX Dynamic Price: Sell Side Review fact sheet,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13200158 to GOOG-DOJ-13200159.

77. Attached to this declaration as **Exhibit 74** is a true and correct copy of a document titled “AdX Dynamic Revshare v2: Launch Doc,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13207875 to GOOG-DOJ-13207881.

78. Attached to this declaration as **Exhibit 75** is a true and correct copy of a document produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13208758 to GOOG-DOJ-13208759.

79. Attached to this declaration as **Exhibit 76** is a true and correct copy of a document titled “Dynamic Revenue Sharing (DRS) V2 Proposal,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13221355 to GOOG-DOJ-13221363.

80. Attached to this declaration as **Exhibit 77** is a true and correct copy of a document titled “Truthful DRS Design Doc,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13227256 to GOOG-DOJ-13227263.

81. Attached to this declaration as **Exhibit 78** is a true and correct copy of excerpts from a presentation titled “Overall Pub Yield With DRS(v2),” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13235100 to GOOG-DOJ-13235120.

82. Attached to this declaration as **Exhibit 79** is a true and correct copy of a document titled “Eng Methodology for DFP system limits,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13340828 to GOOG-DOJ-13340831.

83. Attached to this declaration as **Exhibit 80** is a true and correct copy of a document titled “Bernanke experiment analysis,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13469175 to GOOG-DOJ-13469184.

84. Attached to this declaration as **Exhibit 81** is a true and correct copy of excerpts from a presentation titled “Welcome to Exchange Partnerships Executive Conference 2019,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13501237 to GOOG-DOJ-13501279.

85. Attached to this declaration as **Exhibit 82** is a true and correct copy of email correspondence from [REDACTED] to [REDACTED], et al., with the subject line “Re: DRS per “buyer,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13504758 to GOOG-DOJ-13504762.

86. Attached to this declaration as **Exhibit 83** is a true and correct copy of a presentation titled “gTrade Team Background,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-13625417 to GOOG-DOJ-13625434.

87. Attached to this declaration as **Exhibit 84** is a true and correct copy of a document titled “Design: 1st Price Auction Changes for Reporting,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-14043610 to GOOG-DOJ-14043620.

88. Attached to this declaration as **Exhibit 85** is a true and correct copy of an excerpt of email correspondence from Aparna Pappu to [REDACTED], with the subject line, “Re:

[Monetization-pm] [drx-pm] LAUNCHED! AdX Dynamic Revenue Share (DRS),” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-14368357 to GOOG-DOJ-14368358.

89. Attached to this declaration as **Exhibit 86** is a true and correct copy of an excerpt from email correspondence from [REDACTED] to George Levitte, et al., with the subject line “tDRS Launch Candidate,” produced by Google in this matter, and bearing Bates No. GOOG-DOJ-14743595.

90. Attached to this declaration as **Exhibit 87** is a true and correct copy of email correspondence from [REDACTED] to [REDACTED], with the subject line “[Launch [REDACTED]] gTrade: Project Bernanke,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-14952787 to GOOG-DOJ-14952789.

91. Attached to this declaration as **Exhibit 88** is a true and correct copy of email correspondence from [REDACTED] to [REDACTED], et. al., with the subject line “Re: [PLEASE READ] Active Line Items & Ad Units Limit Limits,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-15127379 to GOOG-DOJ-15127387.

92. Attached to this declaration as **Exhibit 89** is a true and correct copy of a document titled “Dynamic Revenue Share,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-15130321 to GOOG-DOJ-15130328.

93. Attached to this declaration as **Exhibit 90** is a true and correct copy of a document titled “(Comms Doc] - Open Bidding on Ad Manager (fka Exchange Bidding),” produced by Google in this matter, and bearing the Bates Nos. GOOG-DOJ-15389438 to GOOG-DOJ-15389452.

94. Attached to this declaration as **Exhibit 91** is a true and correct copy of an excerpt from email correspondence from [REDACTED] to [REDACTED], with the

subject line “[Cagengleads] [Launch [REDACTED]] Global Bernanke ([REDACTED]),” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-15637938 to GOOG-DOJ-15637940.

95. Attached to this declaration as **Exhibit 92** is a true and correct copy of an excerpt from a presentation titled “Beyond Bernanke,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-28385887 to GOOG-DOJ-28385908.

96. Attached to this declaration as **Exhibit 93** is a true and correct copy of excerpts from a presentation titled “Project Bernanke,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-28386151 to GOOG-DOJ-28386179.

97. Attached to this declaration as **Exhibit 94** is a true and correct copy of a document titled “Project Jordan: Overall Project Summary,” produced by Google in this matter, and bearing the Bates Nos. GOOG-DOJ-30112917 to GOOG-DOJ-30112924.

98. Attached to this declaration as **Exhibit 95** is a true and correct copy of email correspondence from [REDACTED] to [REDACTED], with the subject line “UPCOMING LAUNCH - Please review: [Launch [REDACTED]] Bid Data Transfer file changes for 1st Price Auction,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-00598885 to GOOG-DOJ-AT-00598886.

99. Attached to this declaration as **Exhibit 96** is a true and correct copy of a document titled “Why Google Ad Manager does not participate in header bidding,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-00621267 to GOOG-DOJ-AT-00621269.

100. Attached to this declaration as **Exhibit 97** is a true and correct copy of excerpts from a presentation titled “Header Bidding Observatory #1,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-01027937 to GOOG-DOJ-AT-01027977.

101. Attached to this declaration as **Exhibit 98** is a true and correct copy of excerpts from a presentation titled “DRX\* Contracting Guide,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-01128809 to GOOG-DOJ-AT-01128914.

102. Attached to this declaration as **Exhibit 99** is a true and correct copy of excerpts from a presentation titled “Supply Path Optimisation (SPO): A guide to navigating supply in today's complex ecosystem,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-01152493 to GOOG-DOJ-AT-01152493-0063.

103. Attached to this declaration as **Exhibit 100** is a true and correct copy of an excerpt from a presentation titled “Header Bidding Observatory #3,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-01811246 to GOOG-DOJ-AT-01811276.

104. Attached to this declaration as **Exhibit 101** is a true and correct copy of an excerpt from a document titled “[Comms Doc] - Limit Enforcement: Active Line Items, Active Ad Units,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-01816818 to GOOG-DOJ-AT-01816825.

105. Attached to this declaration as **Exhibit 102** is a true and correct copy of a document titled “[Comms Doc] - Bid DT changes for unified 1P auction ( [REDACTED] ),” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-01906684 to GOOG-DOJ-AT-01906691.

106. Attached to this declaration as **Exhibit 103** is a true and correct copy of excerpts from a presentation titled “Ad Manager Ecosystem 101,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-02199478 to GOOG-DOJ-AT-02199555.



107. Attached to this declaration as **Exhibit 104** is a true and correct copy of a document titled “Bid DT -- Breaking joinability,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-02204409 to GOOG-DOJ-AT-02204412.

108. Attached to this declaration as **Exhibit 105** is a true and correct copy of a document titled “DRX Reporting Plan for First-Price Bidding,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-02321125 to GOOG-DOJ-AT-02321128.

109. Attached to this declaration as **Exhibit 106** is a true and correct copy of a document titled “Don’t First Price CO on AdX & AWBID,” produced by Google in this matter, and bearing the Bates Nos. GOOG-DOJ-AT-02467209 to GOOG-DOJ-AT-02467213.

110. Attached to this declaration as **Exhibit 107** is a true and correct copy of excerpts from a presentation titled “gTrade Team Background,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-AT-02513569 to GOOG-DOJ-AT-02513585.

111. Attached to this declaration as **Exhibit 108** is a true and correct copy of excerpts from a presentation titled “DSP Report,” produced by Google in this matter, and bearing the Bates Nos. GOOG-DOJ-AT-02524665 to GOOG-DOJ-AT-02524749.

112. Attached to this declaration as **Exhibit 109** is a true and correct copy of excerpts from a presentation titled “AdX Auction Optimizations,” produced by Google in this matter, and bearing Bates Nos. GOOG-DOJ-06845977 to GOOG-DOJ-06845993.

113. Attached to this declaration as **Exhibit 110** is a true and correct copy of a Google blog post titled “Introducing simpler brands and solutions for advertisers and publishers,” produced by Google in this matter, and bearing the Bates Nos. GOOG-TEX-00001089 to GOOG-TEX-00001091.

114. Attached to this declaration as **Exhibit 111** is a true and correct copy of a Google Ad Manager blog post titled “Introducing Google Ad Manager,” produced by Google in this matter, and bearing the Bates Nos. GOOG-TEX-00001118 to GOOG-TEX-00001119.

115. Attached to this declaration as **Exhibit 112** is a true and correct copy of a document titled “Profiting from Non-Guaranteed Advertising: The Value of Dynamic Allocation & Auction Pricing for Online Publishers,” produced by Google in this matter, and bearing the Bates Nos. GOOG-TEX-00077719 to GOOG-TEX-00077722.

116. Attached to this declaration as **Exhibit 113** is a true and correct copy of excerpts from a presentation titled “DRX Unified Yield: Management Strategy Review,” produced by Google in this matter, and bearing the Bates Nos. GOOG-TEX-00124787 to GOOG-TEX-00124807.

117. Attached to this declaration as **Exhibit 114** is a true and correct copy of excerpts from a presentation titled “2008 Strategic Planning: DoubleClick Advertising Exchange,” produced by Google in this matter, and bearing Bates Nos. GOOG-TEX-00458239 to GOOG-TEX-00458272.

118. Attached to this declaration as **Exhibit 115** is a true and correct copy of a document titled “DFP+Adx Unification Pro Con review,” produced by Google in this matter, and bearing Bates No. GOOG-TEX-00715568.

119. Attached to this declaration as **Exhibit 116** is a true and correct copy of excerpts from email correspondence from [REDACTED] to [REDACTED], with the subject line “Re: [Monetization-pm] Re: [drx-pm] LAUNCHED! AdX Dynamic Revenue Share (DRS),” produced by Google in this matter, and bearing Bates Nos. GOOG-TEX-00777528 to GOOG-TEX-00777535.

120. Attached to this declaration as **Exhibit 117** is a true and correct copy of excerpts from a presentation titled “Sell-Side All-Hands,” produced by Google in this matter, and bearing Bates Nos. GOOG-TEX-00919252 to GOOG-TEX-00919533.

121. Attached to this declaration as **Exhibit 118** is a true and correct copy of a document titled “Google Ad Manager 360 Services Short Form Agreement,” produced by Google in this matter, and bearing Bates Nos. GOOG-TEX-00976755 to GOOG-TEX-00976810.

122. Attached to this declaration as **Exhibit 119** is a true and correct copy of an Order Form titled “DFP Premium and AdX Services,” produced by Google in this matter, and bearing Bates Nos. GOOG-TEX-00978421 to GOOG-TEX-00978443.

123. Attached to this declaration as **Exhibit 120** is a true and correct copy of an Order Form titled “Google Ad Manger 360 Service,” produced by Google in this matter, and bearing Bates Nos. GOOG-TEX-00980662 to GOOG-TEX-00980684.

124. Attached to this declaration as **Exhibit 121** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED].

125. Attached to this declaration as **Exhibit 122** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED].

126. Attached to this declaration as **Exhibit 123** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED].

127. Attached to this declaration as **Exhibit 124** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

128. Attached to this declaration as **Exhibit 125** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

129. Attached to this declaration as **Exhibit 126** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

130. Attached to this declaration as **Exhibit 127** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

131. Attached to this declaration as **Exhibit 128** is a true and correct copy of [REDACTED]

[REDACTED]

132. Attached to this declaration as **Exhibit 129** is a true and correct copy of excerpts from the transcript and errata of the deposition of Elin Alm taken in his capacity as a corporate representative of the State of South Dakota pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 2, 2024 in this action.

133. Attached to this declaration as **Exhibit 130** is a true and correct copy of excerpts from the transcript and errata of the deposition of Brad Bender taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on June 19, 2024 in *In re Google Digital*

*Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.), produced in this action as GOOG-AT-MDL-C-000056406 - GOOG-AT-MDL-C-000056697.

134. Attached to this declaration as **Exhibit 131** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on September 6, 2024 in *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.), produced in this action as GOOG-AT-MDL-C-000088549 - GOOG-AT-MDL-C-000088739.

135. Attached to this declaration as **Exhibit 132** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on September 21, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

136. Attached to this declaration as **Exhibit 133** is a true and correct copy of excerpts from the transcript of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on August 29, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

137. Attached to this declaration as **Exhibit 134** is a true and correct copy of excerpts from the transcript of the deposition of Andrew Butler taken in his capacity as a corporate representative of the State of Florida pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 22, 2024 in this action.

138. Attached to this declaration as **Exhibit 135** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in her individual

capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on May 22, 2024 in *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.), produced in this action as GOOG-AT-MDL-C-000055464 - GOOG-AT-MDL-C-000055733.

139. Attached to this declaration as **Exhibit 136** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on September 26, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

140. Attached to this declaration as **Exhibit 137** is a true and correct copy of excerpts from the transcript of the deposition of [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on July 28, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

141. Attached to this declaration as **Exhibit 138** is a true and correct copy of excerpts from the transcript of the deposition of Guarionex Diaz Martinez taken in his capacity as a corporate representative of the Commonwealth of Puerto Rico pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 1, 2024 in this action.

142. Attached to this declaration as **Exhibit 139** is a true and correct copy of excerpts from the transcript and attorney errata of the deposition of [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on September 18, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

143. Attached to this declaration as **Exhibit 140** is a true and correct copy of excerpts from the transcript and attorney errata of the deposition of [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 30, 2024 in this action.

144. Attached to this declaration as **Exhibit 141** is a true and correct copy of excerpts from the transcript and errata of the deposition of Jonathan Farmer taken in his capacity as a corporate representative of the Commonwealth of Kentucky pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 25, 2024 in this action.

145. Attached to this declaration as **Exhibit 142** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on October 26, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

146. Attached to this declaration as **Exhibit 143** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his capacity as a corporate representative of Google and in his individual capacity pursuant to Federal Rules of Civil Procedure 30(b)(1) & 30(b)(6) on April 26, 2024 in this action.

147. Attached to this declaration as **Exhibit 144** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) and pursuant a Civil Investigative Demand from the Department of Justice on November 6, 2020, produced in this action as GOOG-AT-MDL-007172126 - GOOG-AT-MDL-007172449.

148. Attached to this declaration as **Exhibit 145** is a true and correct copy of excerpts from the transcript of the deposition of Justin Gordon taken in his capacity as a corporate representative of the State of Texas pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 17, 2024 in this action.

149. Attached to this declaration as **Exhibit 146** is a true and correct copy of excerpts from the transcript of the deposition of Melanie Hall taken in her capacity as a corporate representative of the State of Utah pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 30, 2024 in this action.

150. Attached to this declaration as **Exhibit 147** is a true and correct copy of excerpts from the transcript of the deposition of Chuck Harder taken in his capacity as a corporate representative of the State of Arkansas pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 1, 2024 in this action.

151. Attached to this declaration as **Exhibit 148** is a true and correct copy of excerpts from the transcript and errata of the deposition of Rebecca Hartner taken in her capacity as a corporate representative of the State of South Carolina pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 23, 2024 in this action.

152. Attached to this declaration as **Exhibit 149** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on September 22, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as

[REDACTED].



153. Attached to this declaration as **Exhibit 150** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nirmal Jayaram taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on May 21, 2024 in this action.

154. Attached to this declaration as **Exhibit 151** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nirmal Jayaram taken in his capacity as a corporate representative of Google pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 26, 2024 in this action.

155. Attached to this declaration as **Exhibit 152** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nirmal Jayaram taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on April 25, 2024 in *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.), produced in this action as GOOG-AT-MDL-C-000024439 - GOOG-AT-MDL-C-000024804.

156. Attached to this declaration as **Exhibit 153** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nirmal Jayaram taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) and pursuant a Civil Investigative Demand from the Department of Justice on September 17, 2021, produced in this action as GOOG-AT-MDL-007173084 - GOOG-AT-MDL-007173539.

157. Attached to this declaration as **Exhibit 154** is a true and correct copy of excerpts from the transcript of the deposition of [REDACTED] [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 23, 2024 in this action.

158. Attached to this declaration as **Exhibit 155** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED]

[REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 16, 2024 in this action.

159. Attached to this declaration as **Exhibit 156** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 22, 2024 in this action.

160. Attached to this declaration as **Exhibit 157** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nitish Korula taken in his capacity as a corporate representative of Google pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 24, 2024 in this action.

161. Attached to this declaration as **Exhibit 158** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nitish Korula taken in his capacity as a corporate representative of Google pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 2, 2024 in this action.

162. Attached to this declaration as **Exhibit 159** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nitish Korula taken in his capacity as a corporate representative of Google pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 19, 2024 in this action.

163. Attached to this declaration as **Exhibit 160** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nitish Korula taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on November 3, 2023 in this action.

164. Attached to this declaration as **Exhibit 161** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nitish Korula taken in his capacity as a

corporate representative of Google pursuant to Federal Rule of Civil Procedure 30(b)(6) on November 14, 2023 in this action.

165. Attached to this declaration as **Exhibit 162** is a true and correct copy of excerpts from the transcript and errata of the deposition of Nitish Korula taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) and pursuant a Civil Investigative Demand from the Department of Justice on October 28, 2021, produced in this action as GOOG-AT-MDL-007173923 - GOOG-AT-MDL-007174248.

166. Attached to this declaration as **Exhibit 163** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] [REDACTED] pursuant to Federal Rules of Civil Procedure 30(b)(6) on September 6, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

167. Attached to this declaration as **Exhibit 164** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on May 1, 2024 in this action.

168. Attached to this declaration as **Exhibit 165** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his capacity as corporate representative of Google pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 3, 2024 in this action.

169. Attached to this declaration as **Exhibit 166** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on June 6, 2024 in *In re Google Digital*

*Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.), produced in this action as GOOG-AT-MDL-C-000049841 to GOOG-AT-MDL-C-000050225.

170. Attached to this declaration as **Exhibit 167** is a true and correct copy of excerpts from the transcript of the deposition of Marie Martin taken in her capacity as a corporate representative of the State of Utah pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 30, 2024 in this action.

171. Attached to this declaration as **Exhibit 168** is a true and correct copy of excerpts from the transcript of the deposition of [REDACTED] [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 3, 2024 in this action.

172. Attached to this declaration as **Exhibit 169** is a true and correct copy of excerpts from the transcript and errata of the deposition of Neal Mohan taken in his capacity as a corporate representative of Google and in his individual capacity pursuant to Federal Rules of Civil Procedure 30(b)(1) and 30(b)(6) on May 24, 2024 in this action.

173. Attached to this declaration as **Exhibit 170** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) on July 3, 2024 in *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.), produced in this action as GOOG-AT-MDL-C-000085442 - GOOG-AT-MDL-C-000085725.

174. Attached to this declaration as **Exhibit 171** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken pursuant to Federal Rule of Civil Procedure 30(b)(1) on September 29, 2023 date in *United States et al. v. Google LLC*,

No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED]

175. Attached to this declaration as **Exhibit 172** is a true and correct copy of excerpts from the transcript of the deposition of John Olson taken as a corporate representative of the State of Idaho pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 3, 2024 in this action.

176. Attached to this declaration as **Exhibit 173** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] and in his individual capacity pursuant to Federal Rules of Civil Procedure 30(b)(1) & 30(b)(6) on August 23, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

177. Attached to this declaration as **Exhibit 174** is a true and correct copy of excerpts from the transcript of the deposition of [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on September 8, 2023 date in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

178. Attached to this declaration as **Exhibit 175** is a true and correct copy of excerpts from the transcript of the deposition of [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 23, 2024 in this action.

179. Attached to this declaration as **Exhibit 176** is a true and correct copy of excerpts from the transcript of the deposition of Jeff Pickett taken in his capacity as a corporate

representative of the State of Alaska pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 3, 2024 in this action.

180. Attached to this declaration as **Exhibit 177** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 3, 2024 in this action.

181. Attached to this declaration as **Exhibit 178** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) and pursuant a Civil Investigative Demand from the Department of Justice on July 22, 2021, produced in this action as GOOG-AT-MDL-007179591 - GOOG-AT-MDL-00717995.

182. Attached to this declaration as **Exhibit 179** is a true and correct copy of excerpts from the transcript of the deposition of [REDACTED] [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 25, 2024 in this action.

183. Attached to this declaration as **Exhibit 180** is a true and correct copy of [REDACTED]  
[REDACTED]  
[REDACTED].

184. Attached to this declaration as **Exhibit 181** is a true and correct copy of excerpts from the transcript and errata of the deposition of Anna Schneider taken in her capacity as a corporate representative of the State of Montana pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 1, 2024 in this action.

185. Attached to this declaration as **Exhibit 182** is a true and correct copy of excerpts from the transcript of the deposition of Michael Schwalbert taken in his capacity as a corporate representative of the State of Missouri pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 10, 2024 in this action.

186. Attached to this declaration as **Exhibit 183** is a true and correct copy of excerpts from the transcript and errata of the deposition of Crystal Secoy taken in her capacity as a corporate representative of the State of Mississippi pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 25, 2024 in this action.

187. Attached to this declaration as **Exhibit 184** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) June 13, 2024 in *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.), produced in this action as GOOG-AT-MDL-C-000052613 - GOOG-AT-MDL-C-000052841.

188. Attached to this declaration as **Exhibit 185** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) and pursuant a Civil Investigative Demand from the Department of Justice on July 20, 2021, produced in this action as GOOG-AT-MDL-007177648 - GOOG-AT-MDL-007178018.

189. Attached to this declaration as **Exhibit 186** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in his individual capacity pursuant to Federal Rules of Civil Procedure 30(b)(1) on November 16, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.).

190. Attached to this declaration as **Exhibit 187** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] and in his individual capacity pursuant to Federal Rule of Civil Procedure 30(b)(1) & 30(b)(6) on August 31, 2023 in *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.), produced in this action as [REDACTED].

191. Attached to this declaration as **Exhibit 188** is a true and correct copy of excerpts from the transcript and attorney errata of the deposition of [REDACTED] pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 3, 2024 in this action.

192. Attached to this declaration as **Exhibit 189** is a true and correct copy of excerpts from the transcript and errata of the deposition of Steven Taterka taken in his capacity as a corporate representative of the State of Indiana pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 25, 2024 in this action.

193. Attached to this declaration as **Exhibit 190** is a true and correct copy of excerpts from the transcript and errata of the deposition of Lucas Tucker taken in his capacity as a corporate representative of the State of Nevada pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 29, 2024 in this action.

194. Attached to this declaration as **Exhibit 191** is a true and correct copy of excerpts from the transcript of the deposition of Jonathan Van Patten taken in his capacity as a corporate representative of the State of South Dakota pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 29, 2024 in this action.



195. Attached to this declaration as **Exhibit 192** is a true and correct copy of excerpts from the transcript and errata of the deposition of Patrick Voelker taken in his capacity as a corporate representative of the State of Louisiana pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 3, 2024 in this action.

196. Attached to this declaration as **Exhibit 193** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED]

[REDACTED]  
pursuant to Federal Rule of Civil Procedure 30(b)(6) on June 12, 2024 in *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D.N.Y.), produced in this action as GOOG-AT-MDL-C-000053617 - GOOG-AT-MDL-C-000053960.

197. Attached to this declaration as **Exhibit 194** is a true and correct copy of excerpts from the transcript and errata of the deposition of [REDACTED] taken in her capacity as a corporate representative of Google pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 12, 2024 in this action.

198. Attached to this declaration as **Exhibit 195** is a true and correct copy of Exhibit 72 from the deposition of [REDACTED] taken in her capacity as a corporate representative of Google pursuant to Federal Rule of Civil Procedure 30(b)(6) on April 12, 2024 in this action.

199. Attached to this declaration as **Exhibit 196** is a true and correct copy of excerpts from the transcript and errata of the deposition of Trevor Young taken in his capacity as a corporate representative of the State of Texas pursuant to Federal Rule of Civil Procedure 30(b)(6) on May 24, 2024 in this action.

200. Attached to this declaration as **Exhibit 197** is [REDACTED]

[REDACTED]

[REDACTED]

201. Attached to this declaration as **Exhibit 198** is [REDACTED]

[REDACTED]

[REDACTED]

202. Attached to this declaration as **Exhibit 199** is [REDACTED]

[REDACTED]

[REDACTED]

203. Attached to this declaration as **Exhibit 200** is a true and correct copy of excerpts of the expert rebuttal report of David Deramus on behalf of Plaintiffs in this case, dated September 9, 2024.

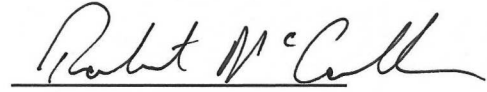
204. Attached to this declaration as **Exhibit 201** is a true and correct copy of excerpts of the Plaintiff States' Seventh Amended Responses & Objections to Google LLC's First Set of Interrogatories, dated May 3, 2024.

205. Attached to this declaration as **Exhibit 202** is a true and correct copy of a Google Ad Manager Help webpage titled "2014 releases archive."

206. Pursuant to Local Rule CR-7 and in accordance with the Court's prior orders concerning sealing personal information and trade secrets, the versions of Exhibits 1-202 are filed under seal.

207. I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 18th day of November 2024, in New York, New York.

A handwritten signature in black ink, appearing to read "Robert J. McCallum", written over a horizontal line.

Robert J. McCallum

**CERTIFICATE OF SERVICE**

I certify that on November 18, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Eric Mahr

**CERTIFICATE OF MOTION TO SEAL**

I certify that contemporaneously with the filing of this Motion, Defendant is filing a motion to seal both this document and the documents attached as exhibits hereto.

/s/ Eric Mahr